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*Attorneys for Defendant
Jeyakumar Nadarajah*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

V.

JEYAKUMAR NADARAJAH

Defendant.

No. 23-CR-00891-CCC

Hon. Claire C. Cecchi

**DEFENDANT’S UNOPPOSED MOTION FOR
MODIFICATION OF BAIL CONDITIONS**

Defendant Jeyakumar Nadarajah respectfully submits this unopposed motion for a modification to his conditions of pretrial release. *See* 18 U.S.C. § 3142(c)(3) (A court “may at any time amend the order to impose additional or different conditions of release.”). Specifically, Mr. Nadarajah requests permission to travel to the Bahamas on a family trip from May 15 to 19, 2025, and to Italy from June 20 to July 2, 2025 for his wife’s 40th birthday. Mr. Nadarajah’s counsel has

consulted with the government and Pretrial Services, both of whom do not oppose the requested modification under the conditions set forth below.

On November 8, 2023, Mr. Nadarajah was released on a secured bond of \$500,000 and permitted to travel to New Jersey and the Southern, Eastern, and Western Districts of New York. (ECF No. 5). On January 4, 2024, pursuant to (1) an unopposed motion by Mr. Nadarajah, (2) Mr. Nadarajah's posting of an additional cash bond of \$150,000 and secured bond of approximately \$905,788.99, and (3) Mr. Nadarajah's execution of a full and irrevocable extradition waiver, the Court issued an order modifying Mr. Nadarajah's bail conditions and allowing him to reside in, and travel to, additional locations. (ECF No. 22). On March 19, 2024, the Court modified Mr. Nadarajah's travel restrictions so that he could travel to and from Southern Ontario and the continental United States until the beginning of his trial, with counsel holding Mr. Nadarajah's passports and accompanying him if he needed to use the passports for travel between the United States and Canada. (ECF No. 36 at 1(a), (c)). On July 1, 2024, the Court modified Mr. Nadarajah's conditions of release and permitted to him to trade certain shares and certificates of deposit. (ECF No. 60, at 1). On December 5, 2024, the Court modified Mr. Nadarajah's conditions to allow him to travel to the Bahamas for a short holiday trip in December 2024. (ECF No. 83). Finally, on January 23, 2025, the Court modified Mr. Nadarajah's conditions to allow him to travel within the United States and Canada writ large. (ECF No. 87).

Mr. Nadarajah now requests permission to obtain his passports from counsel so that he may travel to the Bahamas with his family for a short trip between May 15 to 19, 2025,¹ and to Italy with his wife for her 40th birthday from June 20 to July 2, 2025. Mr. Nadarajah has provided his

¹ In the Bahamas, Mr. Nadarajah will stay at the same hotel he stayed at during his December 2024 trip, as authorized by Pretrial Services.

itinerary and lodging information to the government and Pretrial Services. Mr. Nadarajah will obtain his passports from his counsel no more than 72 hours before each departure and will return them to counsel immediately after he returns.

The requested modifications are justified by Mr. Nadarajah's long history of compliance with his pre-trial conditions. Over the past year, Mr. Nadarajah has regularly traveled across the Canadian-U.S. border to meet with his attorneys as part of trial preparation, and has kept Pretrial Services regularly apprised of his travels. He has appeared for scheduled check-ins with his case officer as directed, communicated regularly with his counsel, and has maintained compliance with each of his other bail conditions, including by providing updates regarding his investment activity. Further, in December 2024, Mr. Nadarajah completed a Court-approved vacation with his wife to the Bahamas, and returned his passports to counsel in accordance with the Court's order. This consistent track record of compliance supports the requested modifications. This modification is also consistent with other similar cases, in which defendants have been permitted to travel internationally to entire countries pending trial. *See, e.g., U.S. v. Chanu*, No. 1-18-cr-00035, Dkt. 56 (N.D. Ill. 2018) (allowing defendant to travel to France and the United Arab Emirates pending trial); *U.S. v. Black*, No. 1:16-cr-00370-CM, Dkts. 30, 41 (S.D.N.Y. 2016) (allowing defendant to travel to the United Kingdom and New Zealand pending trial); *U.S. v. Conti*, No. 1:14-cr-00272-JSR, Dkt. 56 (S.D.N.Y. 2015) (allowing defendant to travel to the United Kingdom pending trial); *U.S. v. Allen*, No. 1:14-cr-00272-JSR, Dkts. 39, 44 at 15–17 (S.D.N.Y. 2015) (allowing defendant to travel to the United Kingdom and France pending trial).

For the foregoing reasons, Mr. Nadarajah respectfully requests that the Court modify his bail conditions as requested. A proposed order, which is unopposed by the government, is included

with this motion.

Dated: April 15, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify pursuant to 28 U.S.C. § 1746 that on this date the annexed Unopposed Motion for Modification of Bail Conditions was filed via the CM/ECF system for the United States District Court for the District of New Jersey thereby effectuating service upon all counsel of record via electronic means.

I certify under the penalty of perjury that the foregoing is true and correct. Executed in Washington, DC on this 15th day of April, 2025.

/s/ William A. Burck
William A. Burck